

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Appellant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

ADV. PRO. NO. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**ORAL ARGUMENT REQUESTED**

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Plaintiff,

-v-

CATHAY LIFE INSURANCE CO. LTD.,

Defendant.

Adv. Pro. No. 11-02568-CGM

**NOTICE OF MOTION ON  
DEFENDANT CATHAY LIFE INSURANCE CO. LTD'S  
MOTION TO DISMISS COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying *Declaration of David W. Parham in Support of Memorandum of Law in Support of Their Motion to Dismiss the Complaint* dated April 25, 2022 and the exhibits thereto, Defendant Cathay Life Insurance Co., Ltd's (the "Defendant") *Memorandum of Law in Support of their Motion to Dismiss the Complaint* dated April 25, 2022, and upon all prior pleadings and proceedings herein, the Defendant, will move

this Court, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, on **August 10, 2022, at 10:00 a.m.** prevailing Eastern Time, before the Honorable Cecelia G. Morris, Chief Judge, for an order dismissing in its entirety the Complaint filed in this action by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (ECF No. 1).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the *Amended Stipulation and Order* entered on March 25, 2022 (ECF No. 115), all papers responsive to the Defendant's Motion to Dismiss the Complaint shall be served and filed no later than **June 24, 2022**, and all reply papers in further support of the Defendant's Motion to Dismiss the Complaint shall be served and filed no later than **July 24, 2022**.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, the Defendant does not consent to the entry of final orders or judgment by this Court.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris' guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court's website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

Dated: Dallas, Texas  
April 25, 2022

**AKERMAN LLP**

By: /s/David R. Parham  
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